## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

JOHN A. ABRAHAM, M.D.,

Plaintiff, CIVIL ACTION NO.: 20-cv-02967 (MMB)

v.

THOMAS JEFFERSON UNIVERSITY, et al.

Defendants.

## **DEFENDANTS' MOTION TO DISMISS FIRST AMENDED COMPLAINT**

For the reasons stated in the accompanying memorandum of law, which is incorporated herein by reference, Defendants hereby move to dismiss Plaintiff's First Amended Complaint in its entirety pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Respectfully submitted,

KLEHR HARRISON HARVEY **BRANZBURG LLP** 

Dated: May 10, 2021 /s/ Stephanie D. Wolbransky

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